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TAGS: [CMGT](#) [CVIS](#) [CASC](#) [KFRD](#)

SUBJECT: CERTIFICATION OF CONSULAR MANAGEMENT CONTROLS

Reftel: State 114455

1. Post's review of Consular Management Controls was completed on November 8, 2008. Jeff Lodinsky, FS-02, Consular Chief, conducted the review and certified its completion. Items in para 2 below are keyed to para 5(a) of reftel.

2. a. Standard Operating Procedures: All officers have access, via the CA Intranet site, to 7 and 9 FAM, FAH-1, the Consular Management Handbook and CA SOPs. All consular section computers have the CA website as their homepage. All officers also have access to CA's classified website. While classified computers are housed in the main Embassy building, all officers have access and utilize them frequently.

b. CST Management: All users in CST were reviewed on November 5, 2008. 1) We confirm that only consular employees have consular roles; only the six American consular officers have adjudicatory roles, and only the Consular Chief and his Deputy have management roles. 2) All active users are currently at post and have the need to utilize the systems to which they have access. No test or anonymous accounts exist. 3) All system access levels are appropriate. 4) Passwords automatically expire after six months and thus must be reset at least that often. There is no sharing of passwords in the consular section. All guidance in SOP 82 is currently being followed.

c. Access: The consular section is located in a different building from the Embassy and is separated from the rest of the building by a controlled access door. Only the consular section employees have the door code. FSNs do not remain in the consular section outside of office hours without a cleared American present. All controlled items are secured when, during office hours, no American is present.

d. Access to Personally Identifiable Information (PII): We confirm that review and collection of PII is confined to official purposes only when absolutely needed in the course of active and legitimate consular work. All information is protected and access to consular systems containing such information is only accessed in connection with official duties. There have been no breaches or incidents involving loss, theft, unauthorized access or compromise of PII. Any such breaches would be reported as described in Department Notice 2008-06-134 of June 25, 2008.

e. Inventory Count and Reconciliation of Accountable Consular Items: The Deputy Consular Chief was designated Accountable Consular Officer (ACO). The Consular Chief and Deputy Consular Chief conducted a physical inventory of visa foils, blank EPDP passports, passport barcodes, CRBAs, passport endorsement foils, emergency passport foils, old blank passports books, wet and dry seals, legend plates, passport ribbons, and print wheels. The results were recorded in writing and matched those in the Inventory Control Ledger. The physical inventory also matches that in the electronic inventory module in ACS+ and the NIV Accountable Items module.

f. Control and Reconciliation of Accountable Items: All accountable items are stored in Mosler combination safes. Only the American consular officers have the combinations to the safes. Controlled items are only released from the safe before their

immediate use and are reconciled daily. Daily and Monthly Reconciliation and Accountability logs record usage and reconciliation of ACS supplies, while the NIV/IV Accountable Items module records all NIV/IV foil usage. There have been no instances of missing controlled items.

g. Destruction Log: Post shreds, using a Department-approved shredder, all spoiled or unusable controlled items. Their destruction is witnessed and immediately recorded in AI or the ACS destruction log. Post follows new guidance on returning all passport books to the Department for destruction as described in State 112062.

h. Cash Accountability: The ACO at post is the Deputy Consular Chief. 1) The ACO, the consular cashier, and his back-up have all been formally designated in writing. 2) The ACO reviewed accounting and reconciliation procedures with the cashier and back-up. 3) The ACO updates the ACRS Daily Accounting Sheet as soon as the class B cashier returns daily receipts. There have been no instances of cash discrepancies in the last 12 months. Monthly reports are forwarded to the FMO for certification and a dually signed copy of the report is kept by the ACO. The ACO (recently arrived at post) has registered and will complete PC-417. The cashier has enrolled in PC 419.

i. Periodic Comparison of MRV fees and NIV applications: Post does not utilize off-site fee collection. Nonetheless, the ACO routinely performs periodic comparisons of MRV fees collected with NIV applications accepted.

j. Referral System: The Mission's most recent visa referral policy was updated and disseminated under the signature of the Management Counselor on August 17, 2008. It was approved by the Deputy Chief of Mission. It was approved by CA/VO/F/P. All referrals are signed by U.S. military Flag Officers, Agency heads or Section heads. All of post's referrals are scanned into the NIV system. Referrals from the past 3 months were reviewed and no anomalies were noted. Part of post's policy is that only officers who have attended the formal referral training course are certified to sign referrals. These courses are held at least once a month. Post has not had any referrals from inside the consular section. If this were to occur, they would be handled identically to all other referrals. Post is also careful to prohibit unofficial referrals and requires a referral for anyone requesting an expedited appointment.

k. Training: Due to Embassy Baghdad's unusual staffing situation, three of post's six LES are TDY from other embassies. They are both senior LES and have all necessary training. The remaining three were hired by Embassy Amman on one-year, renewable contracts to serve in Baghdad. Both have received extensive OJT, but their ongoing training remains a priority. One senior Jordanian hire attended IV training this past FY. ELOs are given OJT and are assisted daily by the Deputy Consular Chief when questions of law, policy or procedure arise. It is very difficult to send ELOs to conferences due to post's one-year assignments, multiple R&Rs, and stringent requirements to be in-country for a set amount of days. Both ACO's have registered to take PC-417 and ACRS training. Consular chiefs have reviewed the management portion of the CA website.

l. Standards of Employee Conduct: All consular employees are aware of the standards of ethical conduct expected of them. The zero tolerance policy of CA has been replicated in the consular section, with a discussion on the topic taking place with all consular staff on November 6, 2008.

m. Namecheck and Clearance Reviews: Namecheck results are thoroughly reviewed by consular officers at post. The determination of hits is handled in a consistent manner, always erring on the side of caution in questionable cases. The Deputy Consular Chief reviews namecheck and FR results on many of post's cases before issuance. SAOs are done for the vast majority of applicants at post, and AOs are also very common. All responses are carefully reviewed to ensure that the original submission was complete and no new hits have been added since.

n. Visa Lookout Accountability: Post confirms that VLA procedures are in place and that all adjudicating officers understand VLA

procedures and the consequences for failure to comply. The Deputy Consular Chief reviews all visa issuances and refusals.

o. Intake, Interview and Screening: Post is in full compliance with 9 FAM 41.102, 41.103 procedural notes, and all other guidance on visa procedures. LES pre-screen the cases for completeness of application; they are not in any way involved in the actual adjudication of the case. Applicants are never turned away before speaking to a consular officer.

p. Oversight of processing: Line-of-sight supervision is practiced by consular officers at post. Officers spend the majority of their time in the section with the LES, especially when controlled items have been released for use.

q. Post is in compliance with fingerprinting regulations. Two NIV LES are authorized to collect biometrics with an officer verifying the prints at the time of interview. Post complies with 05 State 191641 regarding waiving of fingerprints. Fingerprints are always taken, including for diplomats and other government officials applying for B1/B2 visas. The Deputy Consular Chief verifies compliance daily using the Waived Fingerprints Report in the CCD.

r. Interview and Adjudication: Consular Chief confirms that all applicants requiring interviews are required to appear in-person in the consular section. Personal appearance waivers are only granted for diplomats, government officials and employees of designated international organizations applying for A or G visas.

s. Photo Standards: Post maintains strict standards for photos and rigorously applies standards for NIV, IV, and passport photos.

t. Review of Refusals and Issuances: All cases are reviewed by the Deputy Consular Chief using the CCD's NIV Adjudication Review Form. The Consular Chief and Deputy Chief of Mission then review a sample of these cases. Consular Chief confirms that supervisory overcomes are not used in cases of reconsideration in which there was no legal error in the original adjudication.

u. Visa Shopping: Trends in visa applications are monitored by the Deputy Consular Chief and Fraud Prevention Manager. Post rarely sees non-Iraqi applicants. Consular Chiefs confirm that Post does not maintain any sort of NIV written re-application process. Post does not refuse to accept an application from an individual who is physically present.

v. Files: Consular chiefs confirm that files are being managed in accordance with the Record Disposition Schedule and visa files are maintained per 9 FAM Appendix F. All consular personnel understand that visa records are to be safeguarded in accordance with INA Section 222(f). NIV applications are kept in chronological order according to the date the visa was issued or a final refusal was made. Post strictly adheres to the Department's record retention schedule.

w. Passports and CRBAs: The accuracy and integrity of all passports and CRBAs are carefully maintained at post. Namechecks are performed for all citizenship services, and the quality and correctness of decisions and accuracy of information on applications are verified and controlled. Baghdad receives more extra page applications than any other post in the world, and a namecheck is performed for every one. All emergency passport applications are reviewed to determine the true urgency of the situation, and the citizenship documents presented are carefully reviewed. Nationality determinations and passport cases are thoroughly investigated before any decisions are made.

x. Fraud Prevention Programs: Post does not yet have a formal program due to staffing issues, but we work closely with CA/FPP, RSO, FBI, and other foreign missions in Baghdad to prevent fraud in all facets of consular work. We maintain a Lexus/Nexus account that we utilize frequently to check the veracity of applicant claims and/or documents. The Deputy Consular Chief is designated as Fraud Prevention Manager and all management controls are in effect for the fraud prevention program.

y. Classified Access: Although housed in a separate building, all ConOffs have classified e-mail accounts and check them on a regular basis. The Consular Chief checks classified e-mail at least daily.

z. Posts Exercising Supervision of Consular Agents: N/A

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